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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

5 IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

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**AMENDED MASTER SHORT FORM
COMPLAINT FOR DAMAGES FOR
INDIVIDUAL
CLAIMS**

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8 Plaintiff(s) named below, for their Complaint against Defendants named below,
9 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc 364).
10 Plaintiff(s) further show the Court as follows:

11 1. Plaintiff/Deceased Party:

12 Michael Blevins

13 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
14 consortium claim:

15 Not applicable

16 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,
17 conservator):

18 Not applicable

19 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
20 the time of implant:

21 Kentucky

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5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

Kentucky

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Kentucky

7. District Court and Division in which venue would be proper absent direct filing:

United States District Court for the Eastern District of Kentucky,

Pikeville Division

8. Defendants (check Defendants against whom Complaint is made):

x C.R. Bard Inc.

x Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

x Diversity of Citizenship

Other:

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

Defendants' Inferior Vena Cava Filter

claim (Check applicable Inferior Venous

Recovery - Vena Cava

- G2® Express (G2®X) Vena Cava Filter
 - Eclipse® Vena Cava Filter
 - Meridian® Vena Cava Filter
 - Denali® Vena Cava Filter
 - Other:

11. Date of Implantation as to each product:

November 25, 2011

12. Counts in the Master Complaint brought by Plaintiff(s):

- x Count I: Strict Products Liability – Manufacturing Defect
 - x Count II: Strict Products Liability – Information Defect (Failure to Warn)
 - x Count III: Strict Products Liability – Design Defect
 - x Count IV: Negligence - Design
 - x Count V: Negligence - Manufacture
 - x Count VI: Negligence – Failure to Recall/Retrofit
 - x Count VII: Negligence – Failure to Warn
 - x Count VIII: Negligent Misrepresentation
 - x Count IX: Negligence *Per Se*
 - x Count X: Breach of Express Warranty
 - x Count XI: Breach of Implied Warranty
 - x Count XII: Fraudulent Misrepresentation

- Count XIII: Fraudulent Concealment
 - Count XIV: Violations of Applicable Kentucky _____ (insert state)
Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
 - Count XV: Loss of Consortium
 - Count XVI: Wrongful Death
 - Count XVII: Survival
 - Punitive Damages
 - Other(s): _____ (please state the facts supporting this Count in the space immediately below)

1 RESPECTFULLY SUBMITTED this 6th day of March 2017.

2 **SKIKOS CRAWFORD SKIKOS & JOSEPH**

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4 By: /s/ Melissa Mielke

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10 *Attorneys for Plaintiffs*

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